

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF MISSOURI

In re:)	
)	
Mary Crooks,)	
Debtor,)	
)	Case No. 05-71032
)	
)	Chapter 13
)	
Richard V. Fink,)	DEBTOR'S ANSWER TO
Movant,)	MOTION TO DISMISS
)	
)	
vs.)	
)	
Mary Crooks,)	
)	
and)	Castle Law Offices
)	818 Grand Blvd.
Richard V. Fink,)	Ste. 700
Respondent.)	Kansas City, MO 64106

DEBTOR'S RESPONSE TO MOTION TO DISMISS

Comes Now Debtor, Mary Crooks, by and through her attorney of record, Jason C. Amerine, and answers the Motion to Dismiss as follows:

1. That on or about December 7, 2005, the Chapter 13 Trustee filed a Motion to Dismiss for failure to commence making timely payments.
2. That on December 20, 2005, Debtor informed her counsel that she wants to convert to a Chapter 7 Bankruptcy.

3. That Debtor's counsel requests an extension of thirty (30) days to allow time to file conversion schedules for the debtor.

WHEREFORE, Debtor respectfully requests this Court enter an order denying Trustee's Motion to Dismiss; and for such other and further relief as this Court deems necessary and proper.

RESPECTFULLY SUBMITTED,

Castle Law Office of Kansas City

By: /s/Jason C. Amerine
Jason C. Amerine #50857
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Attorney for Debtor

Certificate of Service

The undersigned hereby certifies that a true and accurate copy of the foregoing Answer to Motion to Dismiss was served via electronic filing, on the following parties this December 21, 2005.

/s/Jason C. Amerine
Jason C. Amerine #50857

Mr. Richard V. Fink
Chapter 13 Trustee
818 Grand Blvd. Ste. 800
Kansas City, MO 64106